

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

**Re: D.I. Nos. 461, 2143, 2144, 2145, 2146,
2147, 2148, 2149, 2150, 2151, 2152, 2153,
2154, 2155, 2156 & 2157**

**CERTIFICATION OF COUNSEL REGARDING OMNIBUS ORDER (I)
AUTHORIZING THE DEBTORS TO REJECT CERTAIN EXECUTORY CONTRACTS
AND/OR UNEXPIRED LEASES EFFECTIVE AS OF FEBRUARY 28, 2025, AND
(II) GRANTING RELATED RELIEF**

The undersigned counsel to the above-captioned debtors and debtors in possession (the “**Debtors**”) hereby certify as follows:

1. On October 9, 2024, the Court entered an *Order (I) Authorizing Debtors to Reject Certain Unexpired Leases of Nonresidential Real Property and (II) Authorizing and Establishing Procedures to Reject Executory Contracts and Unexpired Leases* [D.I. 461] (the “**Lease Rejection Procedures Order**”).

2. Pursuant to the Lease Rejection Procedures Order, on February 28, 2025, the Debtors filed fifteen rejection notices, rejecting certain executory contracts and/or unexpired

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

leases as of February 28, 2025 [D.I. 2143–2157] (each a “**Rejection Notice**” and, collectively, “**Rejection Notices**”).

3. The deadline to object to each of the Rejection Notices was March 14, 2025, at 4:00 p.m. (ET) (the “**Objection Deadline**”).

4. Prior to the Objection Deadline, Horizon Media LLC a/k/a Horizon Big, LLC (“**Horizon**”), filed *Horizon Media LLC’s Reservation of Rights to Twenty-Third Notice of Rejection of Certain Executory Contracts and/or Unexpired Leases* [D.I. 2247] regarding certain Horizon contracts noticed for rejection in the *Twenty-Third* Rejection Notice [D.I. 2148]. The Debtors have confirmed with counsel for Horizon that Horizon does not object to entry of the Proposed Order (as defined below).

5. Pursuant to paragraph 4(f) of the *Order (I) Authorizing Debtors to Reject Certain Unexpired Leases of Nonresidential Real Property and (II) Authorizing and Establishing Procedures to Reject Executory Contracts and Unexpired Leases* [D.I. 461], the Debtors have removed two contracts, one between the Debtors and Rand Worldwide Subsidiary, Inc., and one between the Debtors and Rand Worldwide, Inc., (together, the “**Rand Worldwide Contracts**”) from the schedule of contracts rejected by the *Thirtieth Notice of Rejection of Certain Executory Contracts and/or Unexpired Leases Effective as of February 28, 2025 and (II) Granting Related Relief* [D.I. 2155] (the “**Thirtieth Rejection Notice**”).²

6. Attached hereto as **Exhibit A** is a proposed form of omnibus order approving the Rejection Notices and authorizing the Debtors to reject certain unexpired leases

² As set forth in the *Notice of Filing of Twenty-Third Post-Closing Designation Notice* [D.I. 2258] (the “**Twenty-Third Designation Notice**”), the Rand Worldwide Contracts were designated by Gordon Brothers Retail Partners, LLC for assumption and assignment by Variety Wholesalers, Inc. in accordance with the Sale Order (as defined in the *Twenty-Third Designation Notice*).

effective as of February 28, 2025 (the “**Proposed Order**”). For the convenience of the Court and all parties in interest, a redline reflecting the removal of the Rand Worldwide Contracts from the Thirtieth Rejection Notice [D.I. 2155] is attached as **Exhibit B** hereto.

[Remainder of page intentionally left blank]

WHEREFORE, the Debtors respectfully request that the Court enter the Proposed Order attached hereto as **Exhibit A** at its earliest convenience.

Dated: March 19, 2025
Wilmington, Delaware

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